

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
5 Nisha_Brooks-Whittington@fd.org

6
7 Attorney for Dallas Blakley

8
9 **UNITED STATES DISTRICT COURT**
10
DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 DALAS BLAKLEY,
15 Defendant.

Case No. 2:18-cr-00045-JCM-DJA

**STIPULATION TO CONTINUE
REPLY DEADLINE**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Nisha Brooks-
20 Whittington, Assistant Federal Public Defender, counsel for Dallas Blakley, request that the due
21 date for Mr. Blakley's Reply to the Government's Response to Defendant's Motion for
22 Reconsideration of Imposition of Assessment Under the Justice for Victims Trafficking Act
23 (ECF No. 81), be extended five (5) days from June 1, 2022 to June 6, 2022.

24 The Stipulation is entered into for the following reasons:

25 1. Counsel needs additional time to perform legal research and prepare a reply to
the government's response.

1 2. The defendant is incarcerated and does not object to the continuance.

2 3. Additionally, denial of this request for continuance could result in a miscarriage
3 of justice.

4 This is the first stipulation to continue filed herein.

5 DATED this 1st day of June, 2022.

6 RENE L. VALLADARES
7 Federal Public Defender

JASON M. FRIERSON
United States Attorney

8 */s/ Nisha Brooks-Whittington*
9 By _____
10 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

8 */s/ Bianca R. Pucci*
9 By _____
10 BIANCA R. PUCCI
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
DALAS BLAKLEY,
Defendant.

Case No. 2:18-cr-00045-JCM-DJA

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel needs additional time to perform legal research and prepare a reply to the government's response.

2. The defendant is incarcerated and does not object to the continuance.

3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
DALAS BLAKLEY,
Defendant.

Case No. 2:18-cr-00045-JCM-DJA
ORDER

IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to Extend Deadline for Filing his Reply to Government's Response to Motion for Reconsideration of Imposition of Assessment Under the Justice for Victims Trafficking Act, that the Defendant's Deadline to file his Reply is extended to **June 6, 2022**.

DATED this 1st day of June 2022.

Xenia C. Mahan
UNITED STATES DISTRICT JUDGE